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UNITED STATES BANKRUPTCY COURT

Northern District of Illinois, Eastern Division

In re Fidel Gallarzo
Josefina Gallarzo
 Debtor

Case number. 15-04733

Chapter 13

Response to Notice of Final Cure Payment

Name of creditor: Wells Fargo Bank, N.A.

Last four digits of any number you use to identify the debtor's account: ###2378

Uniform Claim Identifier: n/a

Court Claim No. (if known): n/a

Part 1: Status of Payments on Claim and Post-Petition Payments

In response to the Trustee's Notice of Final Cure Payment, Creditor states that:

Section A: Status of Claim Amounts (Choose ONE in Section A)

- ☒ As of 06/01/2016, Debtor(s) has paid in full the amount required to cure the default on the Creditor's claim.
- The Creditor contends that Trustee disbursement(s) totaling _____ have not yet been posted to the account. With the application of those funds, the Debtor(s) will have paid in full the amount required to cure the default on the Creditor's claim.
- ☐ As of _____, Debtor(s) has not paid in full the amount required to cure the default on the Creditor's claim.
- ☐ The Creditor contends that the amounts itemized in Part 2 below remain unpaid.
- ☐ The Creditor contends that Trustee disbursement(s) totaling _____ have not yet been posted to the account. With the application of those funds, the Debtor(s) will have paid in full the amount required to cure the default on the Creditor's claim.

Section B: Status of Post-Petition Payment, Fees, Expenses and Charges (Choose ONE in Section B)

- ☒ **Post-Petition Payments Paid by Debtor(s)**
- ☒ As of 06/01/2016, the Creditor agrees that the Debtor(s) is current on all post-petition payments, fees, expenses and charges. Debtor(s) is due post petition for 07/01/2016
- ☐ As of _____, the Creditor disagrees that the Debtor(s) is current on all post-petition payments, fees, expenses and charges. The Creditor contends that the post-petition payments, fees, expenses and charges itemized in Part 3 below remain unpaid.
- ☐ **Post-Petition Payments paid by Trustee**
- ☐ As of _____, the Creditor agrees that the Debtor(s) is current on all post-petition payments consistent with Section 1322(b)(5) including all fees, charges, expenses, escrow and costs. Debtor(s) is due post petition for _____.
- ☐ The Creditor contends that Trustee disbursement(s) totaling _____ have not yet been posted to the account. With the application of those funds, the Debtor(s) will be current with all post petition payments through the date of the Trustee's Notice consistent with Section 1322(b)(5) including all fees, charges, expenses, escrow and costs.
- ☐ As of _____, the Creditor disagrees that the Debtor(s) is current on all post-petition payments, fees, expenses and/or charges consistent with Section 1322(b)(5). The Creditor contends that the post-petition payments, fees, expenses and charges itemized in Part 3 below remain unpaid.

Part 2: Itemization of Claim Amounts not Cured by Debtor(s)

Description	Amount
1. Late charges	(1) _____
2. Non-sufficient funds (NSF) fees	(2) _____
3. Attorney's fees	(3) _____

4.	Filing fees and court costs		(4)	
5.	Advertisement costs		(5)	
6.	Sheriff/auctioneer fees		(6)	
7.	Title costs		(7)	
8.	Recording fees		(8)	
9.	Appraisal/broker's price opinion fees		(9)	
10.	Property inspection fees		(10)	
11.	Tax advances (non-escrow)		(11)	
12.	Insurance advances (non-escrow)		(12)	
13.	Property preservation expenses.		(13)	
14.	Escrow shortage or deficiency (not included as part of any installment payment listed in line item 15)		(14)	
15.	Past Due Payments			
	_____ - _____	_____ installments at _____		\$0.00
	_____ - _____	_____ installments at _____		\$0.00
	_____ - _____	_____ installments at _____		\$0.00
	Past due payments prior to _____ in the total amount of _____			
	See attached for breakdown			
		Total payments due ▶	(15)	\$0.00
16.	Other. Specify:		(16)	
17.	Other. Specify:		(17)	+
18.	Unapplied Funds		(18)	()
19.	Total Claim Amounts not cured by Debtor(s). Add all of the amounts listed above		(19)	\$0.00

Part 3: Itemization of Post-Petition Payments, Fees, Expenses and Charges not Cured by Debtor(s)

Description	Amount
1. Late charges	(1)
2. Non-sufficient funds (NSF) fees	(2)
3. Attorney's fees	(3)
4. Filing fees and court costs	(4)
5. Advertisement costs	(5)
6. Sheriff/auctioneer fees	(6)
7. Title costs	(7)
8. Recording fees	(8)
9. Appraisal/broker's price opinion fees	(9)
10. Property inspection fees	(10)
11. Tax advances (non-escrow)	(11)
12. Insurance advances (non-escrow)	(12)
13. Property preservation expenses.	(13)
14. Past Due Payments	

Escrow advance on the account?

☐ No

☐ Yes Escrow advance balance on the account is _____ and will be collected through the escrow portion of the ongoing monthly installments.

____ - ____

____ - ____

____ - ____

installments at ____

installments at ____

installments at ____

\$0.00

\$0.00

\$0.00

Past due payments prior to ____ in the total amount of ____

See attached for breakdown

	Total payments due ▶	(14)	\$0.00
15. Other. Specify:	_____	(15)	_____
16. Other. Specify:	_____	(16)	+ _____
17. Unapplied Funds	_____	(17)	(_____)
18. Total post-petition payments, fees, expenses and charges not cured by Debtor(s).Claim Amounts not cured by Debtor(s).		(18)	\$0.00

/s/ Jose Moreno

Attorney for Creditor

Berton J. Maley ARDC#6209399

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Gloria C. Tsotsos ARDC#6274279

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C&A File #14-15-07465

NOTE: This law firm is a debt collector.

Additional Documentation

UNITED STATES BANKRUPTCY COURT

Northern District of Illinois, Eastern Division

NOTICE OF RESPONSE TO TRUSTEE'S NOTICE OF FINAL CURE

TO: Tom Vaughn, Interim Trustee, 55 E. Monroe Street, Suite 3850, Chicago, IL 60603 by electronic notice through ECF
Fidel Gallarzo, Josefina Gallarzo, Debtor(s), 5022 S. Spaulding, Chicago, IL 60632
Ted Smith, Attorney for Debtor(s), 4309 W Fullerton Ave, Chicago, IL 60639 by electronic notice through ECF

PROOF OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice upon the parties listed above, as to the Trustee and Debtor's attorney via electronic notice on June 2, 2016 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on June 3, 2016.

/s/ Jose Moreno
Attorney for Movant

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